

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

CHEYENNE MOORE,  
*Plaintiff,*

v.

K. HOVNANIAN COMPANIES,  
LLC, D/B/A K. HOVNANIAN HOMES,  
*Defendant.*

§  
§  
§  
§  
§  
§  
§  
§  
§

CIVIL ACTION NO. 4:21-CV-1190

---

STIPULATION BETWEEN PLAINTIFF AND DEFENDANT

---

**WHEREAS**, Plaintiff filed her opposed motion to compel mediation and to stay depositions.

**WHEREAS**, Defendant wishes to depose the Plaintiff before attending mediation.

**WHEREAS**, the Plaintiff wishes to attend mediation before the cost and expense of deposing Defendant and Defendant's witnesses.

**WHEREAS**, the Parties have reached a compromise on the issue of depositions and mediations, **THEREFORE**, such agreement is stated as follows:

1. The Plaintiff will make herself available for a deposition to the Defendant in September 2021.
2. After the Plaintiff's deposition, the Parties will mediate this matter within a reasonable timeframe, using an agreed-upon mediator.
3. The Parties will cooperate in scheduling the mediation and if relevant

adjusting deadlines (subject to Court approval if necessary) to allow the mediation to take place.

4. In exchange for mediating at the above-described time, the Plaintiff will file a notice of withdrawal of the Plaintiff's pending Motion to Compel Mediation and to Stay Depositions.

**AGREED TO AND ACCEPTED BY:**



Evan Lange, Counsel for Plaintiff

/s/ Kimberly S. Moore (with permission)  
Kimberly S. Moore, Counsel for Defendant

Date: August 26, 2021

Date: August 26, 2021